

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of)
)
Pacific Bell Petition for Rulemaking) RM-8496
to Amend Section 69.106 of the)
Commission's Rules)

REPLY COMMENTS OF AMERITECH

Ameritech¹ submits these reply comments on the petition for rulemaking filed by Pacific Bell on June 30, 1994. Pacific has requested that the Commission amend its rules to modify the switched access local switching rate element to include two separate charges -- a per-message charge to recoup those costs of setting up a call that do not vary by call duration and a per-minute usage charge to recoup those costs that are duration-sensitive.

The opposition to Pacific's petition was limited in nature. Only two parties, FPMC and CompuServe opposed Pacific's petition in principle. Their filings essentially ask the Commission to continue a subsidy of the point-of-sale ("POS") transaction industry. Others opposed Pacific's petition by either claiming that Pacific's supporting data was insufficient or that Pacific's request should not be considered apart from larger issues related to access reform.

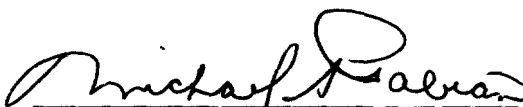
In fact, Pacific has convincingly demonstrated, once again, that the current Part 69 rate structure is insufficient to permit local exchange carriers to reasonably tailor their access offerings to their particular service environments. Like Southwestern Bell, however, Ameritech believes that a new rulemaking proceeding on this subject alone is unnecessary. Instead, the Commission should grant Pacific a waiver to institute its proposed call set-up charge. In addition, and separately, the Commission should proceed with a comprehensive proceeding to revamp its access rules including the

¹ Ameritech means: Illinois Bell Telephone Company, Indiana Bell Telephone Company, Incorporated, Michigan Bell Telephone Company, The Ohio Bell Telephone Company, and Wisconsin Bell, Inc.

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establishment of provisions that would permit the addition of rate elements such as those requested by Pacific without the need for either waivers or rule changes.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Michael Pabian", written over a horizontal line.

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Dated: September 6, 1994

CERTIFICATE OF SERVICE

I, Deborah L. Thrower do hereby certify that a copy of the foregoing Reply Comments of Ameritech has been served on all parties listed on the attached service list, by first class mail, postage prepaid, on this 6th day of September 1994.

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